

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

CURLEY YOUNG,	:	
	:	
Plaintiff,	:	
	:	CASE NO:
vs.	:	
	:	1:06-CV-00563-SRW
HONEYWELL TECHNOLOGY SOLUTIONS, INC.,	:	
	:	
Defendant.	:	
	:	

**EVIDENTIARY SUBMISSION IN SUPPORT OF DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT AND BRIEF**

COMES NOW Defendant, Honeywell Technology Solutions, Inc., and submits the following evidence in support of its Motion for Summary Judgment and Brief, filed contemporaneously herewith:

Tab A DEPOSITION OF CURLEY YOUNG, JR.

Exhibits to Tab A - Deposition

Ex. 2 - Enterprise Hospital and Nursing Home Counseling Form
dated 5/12/92

Ex. 3 - Enterprise Hospital and Nursing Home Counseling Form
dated 11/20/92

Ex. 4 - Enterprise Hospital and Nursing Home Counseling Form
dated 1/11/93

Ex. 6 - Enterprise Hospital and Nursing Home Counseling Form
dated 8/14/93

Ex. 7 - Enterprise Hospital and Nursing Home Counseling Form
dated 10/12/93

- Ex. 8 - Enterprise Hospital and Nursing Home Counseling Form
dated 10/27/93
- Ex. 9 - Enterprise Policy on Absences/Tardies - Write-up dated 1/13/94
- Ex. 10 - Enterprise Response to Alabama Department of
Industrial Relations
- Ex. 12 - Transcription of tape recorded conversation between Curley
Young and Thomas Lavar
- Ex. 15 - Letter of Offer of Employment dated 11/21/97
- Ex. 17 - Acknowledgment of Employee Handbook
- Ex. 18 - Honeywell - The Five Initiatives and 12 Behaviors -
Checklist for Policies
- Ex. 19 - Honeywell Contract Vehicle and Test Security Policy
- Ex. 20 - Honeywell Vehicle and Equipment Maintenance Policy
- Ex. 21 - Honeywell Tardiness Policy
- Ex. 22 - Honeywell Disciplinary Procedure Policy
- Ex. 24 - Allied Signal, Inc. General Conditions of Employment
- Ex. 25 - Memorandum for Record, dated 1/15/99
- Ex. 27 - Certificate of Attendance at Honeywell Diversity Awareness,
dated August 2000
- Ex. 28 - Young Performance Summary 1999
- Ex. 29 - E-mails among William Leyh, Ron Matthews, and Joe Webers
- Ex. 30 - Memorandum of Incident on 9/28/00
- Ex. 31 - Safety Incident - 10/31/00
- Ex. 32 - Report of Incident/Accident/Exposure - 6/24/02
- Ex. 33 - Statement of Thomas Lavar re: Incident of 6/24/02

Ex. 35 - Performance Summary 2002

Ex. 37 - Developmental Counseling Form dated 3/19/03

Ex. 39 - Statement of Thomas Lavar dated 2/28/05

Ex. 41 - Written Warning dated 3/3/05

Ex. 42 - Memorandum on Tardiness dated 4/6/05

Ex. 43 - Jerry Temple's April '05 Update Note

Ex. 44 - Jerry Temple's Third/Fourth Quarter Update Note

Ex. 45 - Memorandum for Record by Thomas Lavar dated 1/25/00 (sic)
(Note: Correct Date is 1/25/06)

Ex. 46 - Record of Counseling dated 1/26/06

Ex. 47 - Thomas Lavar Photographs of Plaintiff's Truck and
Preventative Maintenance Tags

Ex. 48 - Memorandum dated 4/3/06

Ex. 50 (Portion only)

- Performance Evaluation Summary Report by Joe Webers

Plaintiff's Exhibits:

No. 1 - Termination Letter

Tab B Declaration of Kenneth Erickson

Tab C Declaration of William Leyh

Tab D Declaration of James Garrett

Tab E Deposition of Kenneth A. Erickson

Tab F Deposition of Jerry Temple

Tab G Declaration of Thomas Lavar

Tab H	Declaration of Sean Sparks
Tab I	Declaration of Calvin Flowers
Tab J	Honeywell - The Five Initiatives and 12 Behaviors - Checklist for Policies (2005)
Tab K	Electronic Tech Job Description
* Tab L	UNDER SEAL - Selected portions of Robert Hadley personnel file
* Tab M	UNDER SEAL - Selected portions of William Culpepper personnel file
* Tab N	UNDER SEAL - Selected portions of Christopher Hines personnel file

*A Motion for Leave to File Records Under Seal has been filed with this Court. Following entry of an Order granting the same, the sealed records will be provided to the Clerk of Court, with a package also mailed to counsel of record.

s/Sandra B. Reiss
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CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May, 2007, the foregoing Evidentiary Submissions in Support of Motion for Summary Judgment and Brief were filed via this Court's CM/ECF, with an electronic notice and copy served to Jeffrey W. Bennett.

The documents identified as "UNDER SEAL" are the subject of a *Motion for Leave to File Records Under Seal* filed simultaneously with this e-filing, and will be provided to the Court and counsel of record following this Court's ruling on the same.

/s/Sandra B. Reiss
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